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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

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AMERICAN GENERAL LIFE INSURANCE COMPANY,

Plaintiff ,

Case No.
2:10-CV-05604-SDW-MCA

-against-

TELLER FAMILY IRREVOCABLE TRUST VI,
by and through its trustee, GERSON SONTAG a/k/a
GERSHON SONTAG, and TELLER FAMILY
IRREVOCABLE TRUST VII, by and through its trustee,
BEZALEL BERNSTEIN a/k/a BTALEL BERNSTEIN,

**Declaration Of Elizabeth
Eilender In Opposition to
American General's Motion
For Rule 11 Sanctions**

Defendants.

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ELIZABETH EILENDER, hereby declares under penalty of perjury pursuant to 28 U.S.C. 1746 that the following is true and accurate.

1. I am the attorney for the defendants and am making this declaration in opposition to plaintiff's motion for Rule 11 Sanctions.
2. Annexed hereto are the following exhibits:

Exhibit A	Letter from the NYS Insurance Department dated February 10, 2011.
Exhibit B	AIG standard application form utilized by US Life and American General.
Exhibit C	Affidavit of David Weber dated January 25, 2011.

- Exhibit D Copy of check remitted by Trust VI as payment of the initial month's premium for its Teller policy.
- Exhibit E Letter from American General dated September 28, 2010 and associated correspondence dated September 2, 2010 and October 5, 2010.
- Exhibit F Declaration of Gershon Sontag dated March 7, 2011.
- Exhibit G Declaration of Bezalel Bernstein dated March 4, 2011.
- Exhibit H Print-out of American General website page (http://www.americangeneral.com/life/life.nsf/contents/aboutus_legal_notice). Last accessed May 23, 2011.
- Exhibit I American General's reply to its summary judgment motion in *American General Life Insurance Company v. Kirsh*, Civil Action No. H-07-3696, United States District Court for the Southern District of Texas ("*Kirsh*").
- Exhibit J Judge Hoyt's decision in *Kirsh* with respect to American General's summary Judgment motion.
- Exhibit K Motion for Reconsideration in *Kirsh*.
- Exhibit L Declaration of Charles Herring dated May 18, 2011.
- Exhibit M Declaration of Frederick Moss dated May 18, 2011.
- Exhibit N American General's response to the *Kirsh* motion for reconsideration.
- Exhibit O Correspondence from American General's attorneys dated March 23, 2011.
- Exhibit P Letter from Elizabeth Eilender dated April 15, 2011 with proposed Amended Declaration of Gershon Sontag.
- Exhibit Q Correspondence from American General's attorneys dated April 11, 2011 and April 21, 2011 and associated letter from Elizabeth Eilender dated April 11, 2011.

Dated: New York, New York
May 23, 2011

s/Elizabeth Eilender
Elizabeth Eilender